

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Benjamin George,

PLAINTIFF,

v.

City of Chicago, James Gardiner, Charles Sikanich, Chicago Police Officers Solomon Ing (#4117), Peter Palka (#9413), Daniel Smith (#20066), Bilos (#21010), Joseph Ferrara (#233), Sergio Corona (#3331), Ortiz (Star # unknown), and Unknown Chicago Police Officers,

DEFENDANTS.

Case No: 20-cv-6911

Judge: Honorable Robert Blakey

Magistrate Judge: Honorable Beth Jantz

**JURY TRIAL DEMANDED**

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**JOINT STATUS REPORT**

The parties to this action, by and through their undersigned attorneys, and pursuant to this Court's Minute Order of March 21, 2022 (Dkt. 61), respectfully submit this Joint Status Report.

**1. Discovery Plan**

- a. A date for Rule 26(a)(1) disclosures;

The parties will exchange Rule 26(a)(1) disclosures by May 20, 2022.

- b. A date to issue written discovery;

The parties will issue written discovery by June 17, 2022.

- c. The need for, and content of, any proposed confidentiality orders;

The parties anticipate seeking the entry of a confidentiality/protective order and are engaged in negotiating the contours of this order. Plaintiff anticipates requesting the designation of certain material relevant to the action as Attorney's Eyes Only to minimize the threat of retribution

against Plaintiff, and witnesses, by Defendants. The parties will attempt to submit a proposed agreed order to the Court by May 13, 2022; if no agreement is reached among the parties, parties will separately submit proposed orders by this date.

- d. The need for, and content of, any Health Insurance Portability and Accountability Act (HIPAA) waivers;

At minimum, Plaintiff's health records, specifically records of mental health treatment taken as a result of the complained of events, will be relevant to his damages in this action. The parties will submit to the Court a proposed agreed Qualified HIPAA and MHDDACA Protective Order by May 13, 2022; if no agreement is reached among the parties, the parties will separately submit proposed orders by this date.

- e. A fact discovery completion date;

The parties propose a fact discovery completion date of December 17, 2022.

- f. Whether there will be expert discovery, and, if so, an expert discovery completion date (including proposed deadlines for expert disclosures and depositions);

The parties are at present unsure of the necessity of expert discovery. If expert discovery is necessary, the parties propose an expert discovery completion date of April 17, 2023, with initial reports exchanged February 1, 2023, rebuttal reports exchanged by March 1, 2023, and depositions completed by April 17, 2023.

### **3. Status of Settlement Discussions**

There have been no settlement discussions among the parties. The parties do not request a settlement conference at this point.

Respectfully Submitted,

/s/Daniel E. Massoglia

*One of Plaintiff's Attorneys*

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## **CERTIFICATE OF SERVICE**

I, Daniel Massoglia, an attorney, hereby certify that a copy of this document was filed before 11:59pm on 4/29/22 using the Court's CM/ECF filing system, which generates electronic notice to all parties of record in the case.

Respectfully submitted,

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*One of Plaintiff's Attorneys*

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